

# **Exhibit 7**

**Seguin, Paula**

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**From:** Dan Chiorean <dchiorean@odrlaw.com>  
**Sent:** Thursday, August 22, 2019 11:50 AM  
**To:** Glynn, Katie  
**Cc:** Blad, Leiv; Jaramillo, Zarema; 'Daniel Litvin (dlitvin@garwingerstein.com)'; 'van der Meulen, Robin'; 'Deborah Elman'; Chris Letter; 'Kristyn Fields'; 'David Raphael'; 'Kelly Tucker'; Caitlin G. Coslett  
**Subject:** RE: In re Novartis and Par Antitrust Litig. (SDNY)

Good morning Katie,

Lupin and Novel's last productions were on August 5, 2019, over two weeks ago. Plaintiffs asked over 1.5 months ago that Lupin and Novel complete their productions by August 5, 2019, yet there are still multiple outstanding gaps in both productions, as outlined in my email on August 8 below. In other words, Lupin and Novel still have not produced all of the documents they agreed to produce, as set forth in your April 19, 2019 letter and our subsequent meet & confers.

Plaintiffs ask that Lupin and Novel both complete the *entirety* of their outstanding productions no later than September 3, 2019. If we do not receive the documents by that date, or we receive another partial/incomplete production, Plaintiffs will be forced to move to compel.

Many thanks,  
Dan

**Dan Chiorean**  
Odom & Des Roches, LLC  
2020 Poydras Center  
650 Poydras Street  
New Orleans, LA 70130  
Email: [dchiorean@odrlaw.com](mailto:dchiorean@odrlaw.com)  
Tel (504) 522-0077  
Fax (504) 522-0078

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**From:** Dan Chiorean  
**Sent:** Tuesday, August 13, 2019 5:19 PM  
**To:** 'Glynn, Katie' <KGlynn@lowenstein.com>  
**Cc:** 'Blad, Leiv' <LBlad@lowenstein.com>; 'Jaramillo, Zarema' <ZJaramillo@lowenstein.com>; 'Daniel Litvin (dlitvin@garwingerstein.com)' <dlitvin@garwingerstein.com>; 'van der Meulen, Robin' <rvandermeulen@labaton.com>; 'Deborah Elman' <delman@gelaw.com>; Chris Letter <cletter@odrlaw.com>; 'Kristyn Fields' <kfields@faruqilaw.com>; 'David Raphael' <draphael@ssrlp.com>; 'Kelly Tucker' <ktucker@gelaw.com>; Caitlin G. Coslett (ccoslett@bm.net) <ccoslett@bm.net>  
**Subject:** RE: In re Novartis and Par Antitrust Litig. (SDNY)

Katie,  
In addition to the three questions in my email below, attached please find Plaintiffs' correspondence with questions regarding recently produced sales and chargeback data from Lupin and Novel.

Thanks,  
DC

**Dan Chiorean**

Odom & Des Roches, LLC  
2020 Poydras Center  
650 Poydras Street  
New Orleans, LA 70130  
Email: [dchiorean@odrlaw.com](mailto:dchiorean@odrlaw.com)  
Tel (504) 522-0077  
Fax (504) 522-0078

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**From:** Dan Chiorean

**Sent:** Thursday, August 8, 2019 11:39 AM

**To:** Glynn, Katie <[KGlynn@lowenstein.com](mailto:KGlynn@lowenstein.com)>

**Cc:** Blad, Leiv <[LBlad@lowenstein.com](mailto:LBlad@lowenstein.com)>; Jaramillo, Zarema <[ZJaramillo@lowenstein.com](mailto:ZJaramillo@lowenstein.com)>; 'Daniel Litvin' ([dlitvin@garwingerstein.com](mailto:dlitvin@garwingerstein.com)) <[dlitvin@garwingerstein.com](mailto:dlitvin@garwingerstein.com)>; 'van der Meulen, Robin' <[rvandermeulen@labaton.com](mailto:rvandermeulen@labaton.com)>; 'Deborah Elman' <[delman@gelaw.com](mailto:delman@gelaw.com)>; Chris Letter <[cletter@odrlaw.com](mailto:cletter@odrlaw.com)>; 'Kristyn Fields' <[kfields@faruqilaw.com](mailto:kfields@faruqilaw.com)>; 'David Raphael' <[draphael@ssrlp.com](mailto:draphael@ssrlp.com)>; 'Kelly Tucker' <[ktucker@gelaw.com](mailto:ktucker@gelaw.com)>; Caitlin G. Coslett ([ccoslett@bm.net](mailto:ccoslett@bm.net)) <[ccoslett@bm.net](mailto:ccoslett@bm.net)>

**Subject:** RE: In re Novartis and Par Antitrust Litig. (SDNY)

Katie,

We have received and loaded your most recent production. We'll let you know if we have questions about these documents.

Additionally, we had requested that Lupin and Novel complete their productions by August 5, 2019. This production does not appear to be such a completion. At the very minimum, Plaintiffs are still missing:

1. Lupin's supplemental production of documents responsive to Request No. 3, i.e. Lupin's complete regulatory correspondence for ANDA No. 090245.
2. Lupin's production of documents responsive to Request No. 5.
3. Novel's production of documents responsive to Request Nos. 4 and 5

When can we expect to receive these documents?

Regards,  
Dan

**Dan Chiorean**

Odom & Des Roches, LLC  
2020 Poydras Center  
650 Poydras Street  
New Orleans, LA 70130  
Email: [dchiorean@odrlaw.com](mailto:dchiorean@odrlaw.com)  
Tel (504) 522-0077  
Fax (504) 522-0078

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**From:** Glynn, Katie <[KGlynn@lowenstein.com](mailto:KGlynn@lowenstein.com)>

**Sent:** Monday, August 5, 2019 1:00 PM

**To:** Dan Chiorean <[dchiorean@odrlaw.com](mailto:dchiorean@odrlaw.com)>

**Cc:** Blad, Leiv <[LBlad@lowenstein.com](mailto:LBlad@lowenstein.com)>; Jaramillo, Zarema <[ZJaramillo@lowenstein.com](mailto:ZJaramillo@lowenstein.com)>; 'Daniel Litvin' <[dlitvin@garwingerstein.com](mailto:dlitvin@garwingerstein.com)>' <[dlitvin@garwingerstein.com](mailto:dlitvin@garwingerstein.com)>; 'van der Meulen, Robin' <[rvandermeulen@labaton.com](mailto:rvandermeulen@labaton.com)>; 'Deborah Elman' <[delman@gelaw.com](mailto:delman@gelaw.com)>; Chris Letter <[cletter@odrlaw.com](mailto:cletter@odrlaw.com)>; 'Kristyn Fields' <[kfields@faruqilaw.com](mailto:kfields@faruqilaw.com)>; 'David Raphael' <[raphael@ssrlp.com](mailto:raphael@ssrlp.com)>; 'Kelly Tucker' <[ktucker@gelaw.com](mailto:ktucker@gelaw.com)>  
**Subject:** In re Novartis and Par Antitrust Litig. (SDNY)

Counsel,

Please see the attached correspondence. The referenced Sharefile links are below, and the password will be sent via separate cover.

<https://lowensteinandsandler.sharefile.com/d-saa3bc11c8df4d4b8>

<https://lowensteinandsandler.sharefile.com/d-sb3f74af303845d19>

Thanks,  
Katie

**Katie R. Glynn**  
Associate  
Lowenstein Sandler LLP

**T:** 202.753.3824  
**F:** 202.753.3838



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